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Jim, Rick and Bob,

The purpose of this email is to provide the LWG management team with some draft language regarding the stormwater sampling planned for the 2006/2007 water year. Please discuss as necessary.

As EPA has indicated in earlier emails, the collection of stormwater is neither strictly a source control task nor is it strictly an in-water RI/FS task. Rather the collection of stormwater data serves both purposes. From a source control perspective, the data is necessary to characterize stormwater to get the information necessary to determine whether source control is required. From an in-water RI/FS perspective, the data is necessary to support the contaminant fate and transport evaluation and food web model and help determine site specific cleanup levels for the Portland Harbor site.

The sampling proposed for the 2006/2007 water year involves four elements:

- 1) Screening level data to be collected by upland parties under DEQ oversight.
- 2) Recontamination data to be collected by the Port of Portland as part of the T4 Early Action
- 3) Robust sampling to characterize sites on a land use basis. Land-use data will be used to estimate stormwater contributions from similar land-use areas.
- 4) Robust sampling to characterize high priority sites on a site by site basis. High priority sites are those facilities with unique contaminants or expected to be significant sources of contamination to Portland Harbor.

The LWG has agreed to implement elements 3 and 4. Elements 3 and 4 support DQOs 1 and 2 (contribution to water column risk and contribution to sediment risk). DQO # 3 (source tracing) is not an objective of this work. EPA, DEQ and the LWG have agreed that it is necessary for the LWG to collect this data, despite the source control overlap, to expedite the characterization of stormwater during the 2006/2007 water year and to ensure that the Portland Harbor RI/FS remains on schedule. The technical and management teams have reached agreement on the sites to be sampled and the general approach for characterization. A field sampling plan will be developed collaboratively over the next month that described in greater detail the stormwater sampling program for 2006/2007.

The results of the LWG stormwater sampling effort will be assessed to determine what modifications, if any, are necessary prior to additional stormwater sampling at upland facilities. EPA expects that future stormwater sampling to be implemented during the 2007/2008 water year will be focused on the additional characterization necessary to support the need for source control and will be collected by upland parties under DEQ oversight. However, EPA recognizes that the Comprehensive Round 2 Site Summary and Data Gaps Analysis Report and preliminary results from the hybrid fate and transport model may identify additional in-water RI/FS data gaps related to stormwater loading. EPA expects that these data gaps will be implemented by the LWG as part of the Round 3B sampling effort. EPA also

recognizes that additional stormwater characterization may be required as part of remedial design (e.g., to support a recontamination evaluation). Prior to the implementation of additional stormwater sampling, EPA, DEQ and the LWG will meet to determine whether the proposed data collection efforts are primarily a source control data collection effort, an in-water RI/FS data collection effort or an RD/RA data collection effort.

EPA appreciates the willingness of the LWG to undertake the 2006/2007 water year stormwater sampling effort. EPA believes that the sampling program developed jointly by EPA, DEQ will go a long ways towards improving our understanding of the contribution of stormwater contaminants to the Portland Harbor, support the food web and contaminant fate and transport models and determine the need for source control measures aimed at the stormwater migration pathway. We look forward to continuing our collaborative efforts to ensure that the sampling takes place during the 2006/2007 water year.

Thanks, Eric